Branigan, Terence

From:	Cooney, Nigel (ENRD) <Nigel.Cooney@usdoj.gov>
Sent:	Thursday, December 14, 2017 1:55 PM
To:	Anson Keller; Gary H. Baise; Len Ashack (LAshack@cityofjeff.net)
Cc:	Beth Admire; DTENNIS@idem.IN.gov; Bajor, John; Bahr, Ryan; Fericelli, Paul; Rog, Morgan; Branigan, Terence
Subject:	Jeffersonville LTCP Amendment Proposal - List of EPA-IDEM technical questions
Attachments:	ENV_ENFORCEMENT-#2708412-v1-Jeffersonville_-_Technical_Questions_re_LTCP_Amendment_-_12-14-2017.PDF

Counsel,

Attached please find a list of technical/engineering questions from EPA and IDEM related to Jeffersonville's October 20, 2017 letter and October 24, 2017 supplement.

Once you have had a chance to review, please let us know your anticipated timeline for a response and Jeffersonville's proposal for next steps (i.e., what is the timing for Jeffersonville's written submittal in response to the questions, and does Jeffersonville still wish to proceed with a meeting and facility tour and when).

Kind regards,
Nigel

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December 14, 2017

List of Technical Questions Regarding Jeffersonville LTCP Amendment Proposal.

The following list of questions is being submitted to Jeffersonville by U.S. EPA and IDEM regarding the proposal outlined in Jeffersonville's October 20, 2017 letter and October 24, 2017 supplement. These questions relate solely to the technical/engineering aspects of Jeffersonville's outlined LTCP amendment proposal. These questions are meant to continue the information exchange but are not intended to constitute an exhaustive list of questions or concerns that U.S. EPA and IDEM may have regarding Jeffersonville's submittals to date. These questions do not reflect U.S. EPA's and IDEM's concerns regarding Jeffersonville's financial justification for an LTCP modification; nor do these questions presuppose that that a financial case for LTCP modification has been adequately demonstrated.

1. The current LTCP contains 1 annual CSO event to the Ohio River and 3 to Cane Run. Table 1 of the letter lists 2 annual events to the Ohio River with an asterisk as 1 event every six months. Please explain. Is modeling information available for independent agency review? If the proposed CSO volume reductions are expected, why are the typical year events increased?

2. Please provide a current flow diagram of the downtown WWTP (including the headworks), and please provide a flow diagram showing the proposed sewer layouts for the 10th Street PS and downtown WWTP (including the CEHRT), including the proposed point of sampling for the recombined effluent.

3. Will wet weather flow be screened prior to entering the proposed CEHRT? If yes, please describe the plans to provide screening to the wet weather flow going into the proposed CEHRT. Is a new screening unit to be constructed for the influent CEHRT?

4. Please explain the engineering justification for the proposed size of the CEHRT. Was the justification based on a design storm, and if so what year was used as a Typical Year or what design storm was used?

5. Will the recombined effluent comply with the POTW's effluent limits even during wet weather? What assumptions /flows were considered in the submittal Jeffersonville made to IDEM for phosphorus controls are those the same assumptions being used for evaluating treatment for wet weather flows?

6. As the proposal requests additional activations, what impacts has the City considered to designated uses of the Ohio River and Cane Run. Which CSO locations will increase its number of activations in the Ohio River and Cane Run?

7. Based on the proposed LTCP amendment (increased frequency of untreated CSO discharges, but higher volumes captured), has the City considered how Indiana Water Quality Standards would be affected? Are there limitations involving the State of Kentucky as well as Indiana? Which CSO locations discharge into sensitive areas and/or IDEM-defined priority areas of the Ohio River and Cane Run?

8. Are stormwater costs included in the proposed project?

9. The City is proposing to reduce the East/West interceptor to a 60" sewer and the North/South Interceptor to a 72" interceptor on page 1 of the letter but page 3 refers to the East/West interceptor as being reduced to a 72" sewer with an additional 36" sewer to achieve dry weather scour velocity. Please explain which is correct.

10. Page 2, Item 2 in your letter states additional storage volume has been attained in the proposed plan by maximizing the elevations of the CSO regulators along the Ohio River but item 1 on this page states that the proposed plan deceases the storage volume of the interceptor. Please explain. Please detail the regulators involved. Do they include those at CSOs 008, 009, 010, 011, 013, 019, 020 and 021? Can you provide the modeling inputs and results? Is the new modeling data based on the new regulator elevations and are the proposed improvements available?

11. What specific type of CEHRT is Jeffersonville proposing? Is there performance history available for the proposed CEHRT clarifier form other current operating locations? What is the anticipated performance criteria for the proposed CEHRT?

12. Describe the manner in which the plant effluent and CEHRT will operate relative to meeting disinfection requirements contained within the NPDES Permit.

13. Please describe the "flushing mechanism" infrastructure proposed for the 36" low flow sanitary sewer. Include capital and Operation & Maintenance (O&M) costs for the number of units proposed.

14. Please describe the engineer's probable cost estimate of the increased O&M necessary for the flushing mechanism, CEHRT, odor and hydrogen sulfide controls and other capital improvements necessary with the proposal.

15. Please describe the point of discharge of the POTW in the Ohio River (i.e., Mill Creek's Outfall 022) and the manner in which the recombined effluent is to be sampled during wet weather. Utilizing the anticipated performance criteria of the CEHRT system, discuss the quality of the anticipated combined effluent as compared to existing NPDES permit Limits.

16. Please confirm the peak pumping capacity of the 10th Street Lift Station. It is said to be 50 MGD, but that is the maximum flow to the POTW. What about the pumping capacity for the HRT? The Mill Creek pump station peak rate is 8 MGD, the Spring Street pump station peak rate is 6 MGD.

How does this affect the proposed 10th Street pump station pumping capacity of 50 MGD? Is 50 MGD the capacity with all five pumps running?

17. Please provide a map of anticipated growth/ population equivalent projections to the Jeffersonville POTW and describe the manner in which this flow is taken into consideration for the proposed POTW and any planned changes to the collection system.